

(EXHIBIT D)

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SUPERIOR COURT OF ARIZONA
COUNTY OF MARICOPA

MANNY CHAVEZ a/k/a "DEFANGO")	
)	
Plaintiff)	
)	
v.)	Case No. _____
)	
JASON GOODMAN)	PLAINTIFF DEMANDS
)	TRIAL BY JURY
Defendant.)	
_____)	

COMPLAINT

Plaintiff, Manny Chavez a/k/a "Defango", by counsel, files the following Complaint against Defendant, Jason Goodman ("Goodman").

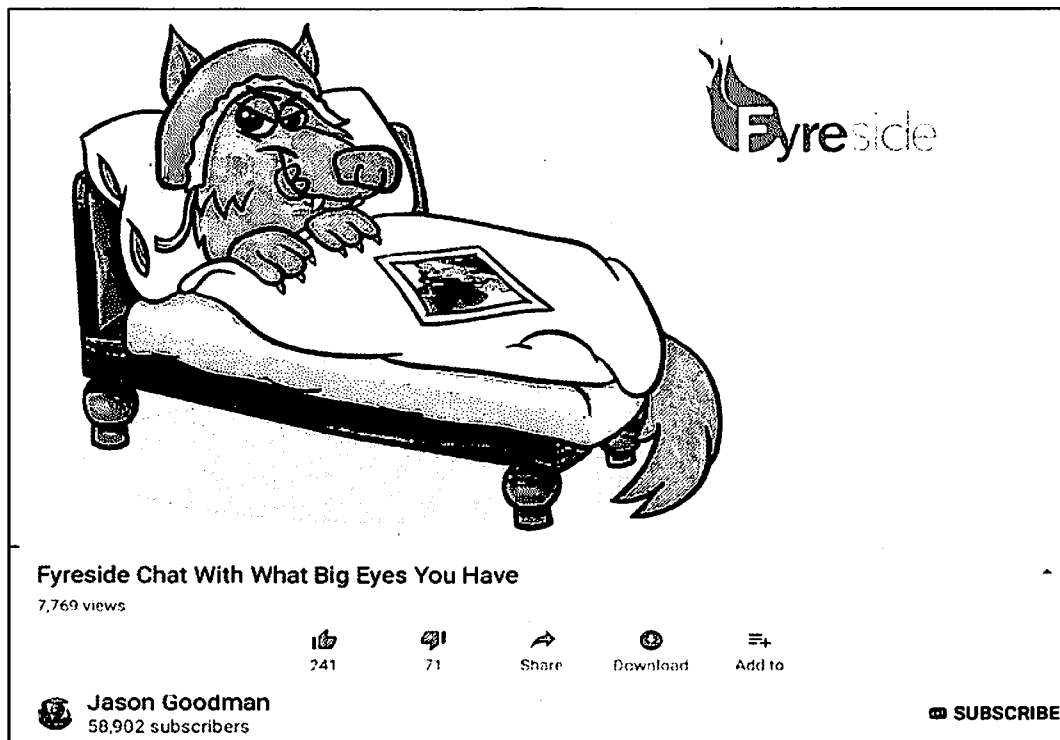
Plaintiff seeks (a) compensatory damages and punitive damages in an amount not less than **\$3,500,000.00**, (b) prejudgment interest on the principal sum awarded by the Jury from June 3, 2017 to the date of Judgment at the rate of six percent (6%) per year, (c) attorney's fees, and (d) costs incurred – arising out of Defendants' tortious interference with contract, defamation *per se*, false light invasion of privacy, civil conspiracy and misappropriation.

I. INTRODUCTION – THE FYRESIDE CHAT

1. Jason Goodman operates a fake news channel on YouTube, which he calls "Crowdsource The Truth". Goodman has 58,000 disciples called "followers". On September 27, 2017, Goodman published a YouTube video about Plaintiff. [<https://www.youtube.com/watch?v=sV3bY-4pj4Y&feature=youtu.be>]. The video is called, "*Fyreside Chat With What Big Eyes You Have*". Goodman intentionally

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

misspelled the word “Fyreside”. “Fyreside” actually refers to Plaintiff’s then-employer, “Fyresite”, a Phoenix-based Web Design, Web Development and App Developer. [<https://www.fyresite.com/>]. Goodman’s YouTube video features Goodman and an anonymous third-party – a woman recruited from southwest Virginia who Goodman identifies only as “What Big Eyes You Have”. Goodman’s confederate appears in the video as the wolf from Little Red Riding Hood:¹



¹ “‘Oh, grandmother,’ [Little Red Riding Hood] said, ‘what big ears you have.’ ‘The better to hear you with, my child,’ was the reply. ‘But, grandmother, what big eyes you have,’ she said. ‘The better to see you with, my dear.’ ‘But, grandmother, what large hands you have.’ ‘The better to hug you with.’ ‘Oh, but, grandmother, what a terrible big mouth you have.’ The better to eat you with.’ And scarcely had the wolf said this, than with one bound he was out of bed and swallowed up Little Red Riding Hood.” [<https://germanstories.vcu.edu/grimm/redridinghood.html>]. The burning “F” used by Goodman in the word “Fyreside” is a logo that actually belongs to Plaintiff’s former employer, Fyresite. Goodman misappropriated Fyresite’s intellectual property.

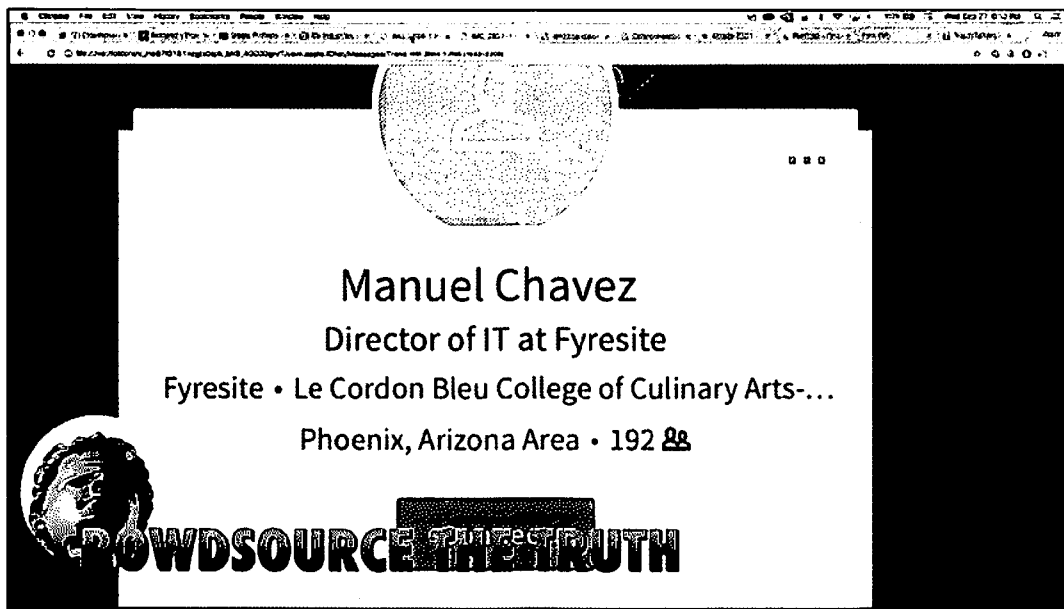
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Goodman and his confederate appear together and act in concert throughout the video,

e.g.:



2. Plaintiff's name and picture, and the name and logo of Fyresite, are used throughout Goodman's YouTube video, *e.g.:*



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3. In the video, Goodman doxxed² the CEO of Fyresite, Jason Turnquist [<https://www.fyresite.com/team/>] and Mr. Turnquist's father, Rick Turnquist. Goodman even published a picture of Plaintiff dancing with Mr. Turnquist's wife at her wedding:



² "Dox" means to publicly identify or publish private information about (someone) especially as a form of punishment or revenge. [<https://www.merriam-webster.com/dictionary/dox>].

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

4. The sole purpose of Goodman's *Fyreside Chat* video was to cause Fyresite to terminate Plaintiff's employment. Goodman's goal was (a) to generate false publicity about Plaintiff and Fyresite, (b) to cast aspersions on Plaintiff's job performance, his honesty and trustworthiness, (c) to undermine confidence in Plaintiff, (d) to drag Fyresite and Jason Turnquist (and his wife and father) into Goodman's dispute with Plaintiff, and, ultimately, (e) to poison the relationship between Plaintiff and his friend, Jason Turnquist. Goodman's methods were improper, immoral, unethical, sharp and oppressive.

5. In the *Fyreside Chat* YouTube video, Goodman and his confederate ("What Big Eyes You Have") publish the following tortious, false, defamatory and disparaging statements about Plaintiff:

a. [Beginning at 7:40 of the video] Manny "attacked" Goodman – "it was Defango who did that, and it was the instant that you got this file from [Patricia Negron] ... and he started ... trying to start all kinds of things ... Then I started looking at where he [Manny] worked, and he's got on there that he works for this um, website company, and then I started I said well ok so who is his boss, and I found his boss to be Jason [Turnquist]."

b. [Beginning at 11:17 of the video] "And, of course, we want to say ... we're not implicating Fyresite per se. It's just interesting that this is where he works. He talks about it on his channel. When you go on to Facebook right now this information is available to the public. Meanwhile, Chavez does seem to be good friends with Jason Turnquist. He's pictured in photographs at the guys wedding, dancing here with his wife.

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

That's certainly a close relationship, not everybody goes to their employer's wedding necessarily".

c. [Beginning at 12:07 of the video] "Right, and so then I looked at their [Fyresite's] website and ... it seems to be uh fairly on the up-and-up and so I said, well, who is this guy [Jason Turnquist] related to, so I started looking and I found his father, uh, works for a company that supplies um, industrial style compressors".

d. [Beginning at 12:53 of the video] "Let me slow down for just one second there What Big Eyes You Have because ... Fyresite is uh owned and run by Jason Turnquist and he employs Manuel Chavez and ... Jason's father, Rick Turnquist, is a sales engineer at this totally unrelated company, Rix Industries, that's uh been in business for a long, long time. Rick Turnquist has been employed there for 36 years ... that's a long time".

e. [Beginning at 13:26 of the video] "Right, right he's [Rick Turnquist] been there a very long time. It looks like it's been a lifelong career for him. And Rix Industries is ... now veteran owned which is a good thing. And then you can find their ... contract uh allotments on the government sites of how much they've been awarded, and I think in the past 8 years it's been something like um, 64 million dollars worth of um, purchase orders and ... of course they have a very good reputation³ with the government for the stuff they furnish ... And so, from there I said, well you know I don't know if there's some kind of thing that ... he [Defango] has recommendations ... for the job he has with um, Fyresite, because his degree is in uh, culinary arts, and that's about as

³ The implication, inference and insinuation that Goodman wanted viewers to draw was that association or affiliation with Plaintiff would adversely impact the "very good reputation" of the Turnquists and Fyresite.

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

far as you can get from being a IT Director. Now, I know he's a very good hacker [laughing]. I think we both know that [laughing]. I think we have first-hand knowledge of that.⁴

f. [Beginning at 15:07 of the video] "Well, he certainly claims to be ... I mean there are some strange things that have happened. I've spoken about how a private text message that I had sent um, mysteriously appeared on his program on his live stream. I didn't really appreciate that very much. Uhhhh, he ... said somebody sent that to him. Certainly, that's possible. I don't know how he got it. It was sure weird ... So uh, you know when that file came to us there was, um a hack or a uh like a phishing thing that happened to my computer. I posted a couple different images of some of the weird error messages that I got that were trying to tell me to buy McAfee Antivirus. It wasn't a hack, pardon me, it was a virus or something that got some malware onto the computer, and um, that seemed to uhhh, sort of initiate some strange behavior ... and someone else is telling me that Defango just went live. Now that's interesting and that speaks to some of the other points that you've brought up, What Big Eyes You Have. If this is a guy who's working full time for this company uh, Fyresite, where he's supposed to be engaged in the activities of creating websites, well you'd think he'd be pretty busy at 3 o'clock in the afternoon in um, Arizona, here he is, working on all these you know major websites that it seems those guys are engaged in creating. I don't know how he has time to be just monitoring my broadcasts. It seems whatever time of day or night I go on he

⁴ Computer hacking is a crime. Goodman's *Fyreside* video was intended to disparage and defame Plaintiff to his employer – a desktop and mobile website and applications design and development firm – and generally on the Internet. Goodman's statements impute to Plaintiff an unfitness to perform his duties as IT Director for Fyresite. Accusations of being a known "hacker" also prejudice Plaintiff in his work.

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

seems to go on, and uh shouldn't he be working for Fyresite? ... So, the fact that Defango is obviously very very close friends with the owner of uh this Fyresite company, you know he's at his wedding here, he's uh dancing with the guys wife at the wedding, ... you would think that he'd say hey you know you shouldn't be uh, putting up videos that make fun of Jewish people. We might have some Jewish clients among all of the websites that we uh want to create. You shouldn't come on Jason's broadcast and call Jason a faggot because you might offend some members of the gay LGBTQ community, and generally people that run respectable companies like Fyresite uhh, they don't want their directors of IT having these very public and controversial opinions that could offend or insult potential clients".

g. [Beginning at 18:51 of the video] "Yes, that's very true, and also I came across an article, uh on the Internet that was written up in a uh newspaper umm, and I think it's the Arizona or the Phoenix news times ... Trash talking pot advocate blasts the New Times reporting on the Arizona marijuana legalization initiatives. And here we've got a picture of our friend Manuel Chavez, Defango Wango Tango Mango making a stupid face as he's prone to do."

h. [Beginning at 19:34 of the video] "Not only that, if you look at the logo on his shirt, it says Fyresite ... So you would think if this guy's showing up in the newspaper making the local newspaper angry, why is Fyresite not telling him to sort of cool down some of his public opinions. Are they really comfortable being uhhh, you know this closely associated with someone [Manny] who is openly offending just about everybody he can think of?"

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

i. [Beginning at 21:04 of the video] “I mean, is this really someone who out of uhh, his hobby is just, you know thinks I’m so annoying that he’s gotta spend all his time making videos about me? ... I don’t know why he thinks I have some obligation to speak to him. He’s is a moron ... The point of the matter is, I’m curious, I’m speculating, is it possible that his employment at Fyresite is somehow a mechanism by which he gets paid to carry out these various political operative type maneuvers, like maybe you know, anytime I go live with a broadcast, it’s immediately followed up by a stupid response from someone like H.A. Goodman ... who’s supposed to be a progressive political pundit, why is he paying attention to and giving broadcast time to someone as stupid as Defango. It doesn’t make any sense. I mean it was so obvious to me that Defango was lying from the very beginning ... He pretended to offer help, but just immediately started putting out all these videos about how I’m a Jew, and how I’m a liar, and how I’m a porn star, and how I’m Bryan Singer’s brother, and how I never talk about working on X-Men Days of Future’s Past ... and I know a lot of people feel like they’re jealous and whatever.”

j. [Beginning at 26:03 of the video] “And ... at 3 o’clock in the afternoon, while he’s there in Arizona, when you’d think, he would be busily working, at the respectable uh website creation company known as Fyresite, he’s got enough time on his hands to be paying attention to what I’m doing here in New York City, and uh immediately come on with a live broadcast and start Skyping me ... I’m nor causing drama. We’re trying to point out to people, the mechanisms by which these political operatives, seem to try to subvert the truth, and seem to try to prevent us from exposing corruption ... CrowdSource The Truth, is just a website owned by my private

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

corporation, 21st Century 3D ... Now, we're presently losing money because it costs more money to operate, then the uh money that we earn from doing this endeavor. And that reminds me, it would be really great if people who enjoy our broadcasts would visit the PayPal site, and go to PayPal.me Crowd Source the Truth, or become a regular sponsor on Patreon, Patreon.com Crowd Source the Truth, and help us continue fighting, the type of corruption that we're talking about, right now ... What else would you like to share with us particularly about Mr. Chavez or Mr. Robert David Steele?"

k. [Beginning at 29:03 of the video] "Well, basically, they're both the same in the fact that, they want to stop the truth from coming out".

l. [Beginning at 31:01 of the video] Manny has "said that I [Goodman] am a porn star. He has said that I am a pedophile, one of the most disgraceful things he has said about me. Each of these things are totally untrue, totally baseless, manufactured nonsense. Now, that is slander. That is libel. And, as a matter of fact, accusing me of being a pedophile is a special kind of libel. It's called libel per se. Because, by accusing me of a crime and particularly serious heinous crime, it inherently damages my reputation."

6. Goodman's *Fyreside Chat* video was the last straw in a month's long effort to get Plaintiff fired from his job at Fyresite. During that month, Goodman and agents acting on his behalf repeatedly called Fyresite in Phoenix and made threats and disparaging statements about Plaintiff – all for the purpose of getting Plaintiff fired. Fyresite saw the *Fyreside Chat* YouTube video.

7. Goodman's tortious interference, purposefully directed towards Arizona, caused Fyresite to terminate Plaintiff's employment on September 28, 2017. Fyresite

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

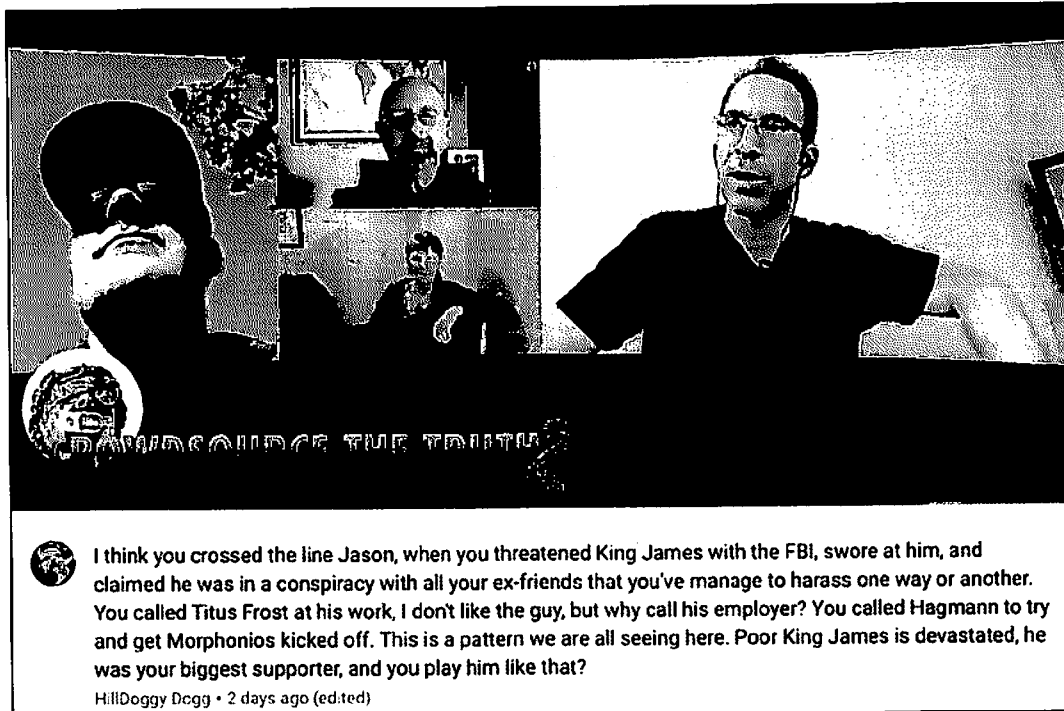
notified Plaintiff that it had been getting “phone calls” and did not want “bad press”, so Plaintiff had to go. Plaintiff had been with the company for over three (3) years. He lost a 5% stake in Fyresite and was left unemployed. He is getting by doing contact work now, but his YouTube channel, name and online reputation have been substantially damaged.

8. In 2018, Plaintiff learned that Goodman’s acts are part of a common scheme or pattern in which Goodman retaliates and interferes with the employment relationships of his victims. There are multiple targets of Goodman’s retaliation and interference. Other targets of Goodman’s malicious conduct, including “Titus Frost”, report the exact same *modus operandi*:



[*Id.* <https://www.youtube.com/watch?v=SvTOhV05YGU>]. On May 4, 2018, Goodman published a video on his alternate YouTube channel, “Crowdsourced The Truth 2”, entitled “*The Trolls Of Mount Shasta*”. YouTube channel member “HillDoggy Dogg” made the following comment:

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT



9. Goodman is a serial defamer. He uses YouTube and other social media platforms to stalk, mercilessly attack, and defame.

II. PARTIES

10. Plaintiff, Manny Chavez ("Manny"), is a citizen of Arizona and a resident of Maricopa County. He is ___ years old. Manny is a Graduate of Le Cordon Bleu College of Culinary Arts – Scottsdale, where he earned a Bachelor of Science (BS) in Restaurant, Culinary, and Catering Management/Manager. He is a chef, treasurer hunter and puzzle solver with a deep knowledge of computers, computer programming and the Internet. *See, e.g.,* <https://www.instagram.com/defango/?hl=en>; <http://defango.com/>; <https://steemit.com/@defango>. He creates original content and publishes videos and other information online. He has two (2) YouTube channels called "Defango" and "Merlin Defango", a Twitter account, @Defango, and a Facebook page. [https://www.youtube.com/channel/UCPDjx4qeqDCJYvFJP_Ynbhg;

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

<https://www.youtube.com/merlindefango>; <https://twitter.com/defango?lang=en>;
<https://www.facebook.com/defango>; see also <https://www.patreon.com/Defango>].

Manny is a private individual.

11. Defendant, Goodman, is a citizen of New York. Goodman claims to be a graduate of New York University (BFA Film), an actor, and Hollywood cinematographer. Goodman claims to be the CEO of 21st Century 3D, which Goodman describes as “a full-service stereoscopic 3D motion picture production company with offices in New York City and Los Angeles.” Goodman has substantial experience in the production and upstreaming of live videos. He owns, maintains and operates multiple Internet and social media properties, including two (2) YouTube channels [www.youtube.com/channel/UC8CI9QaRtuW9CNjP7pP4BBQ] (“Jason Goodman”) and [https://www.youtube.com/channel/UC6e48gru_N9w-tyqMCrI9Qw] (“CrowdSource The Truth 2”)], a Facebook page [<https://www.facebook.com/CrowdsourcetheTruth-1331354320209243/>], a Twitter account [<https://twitter.com/csthetruth?lang=en>], an account at Patreon.com, [<https://www.patreon.com/crowdsourcetheTruth>], and an account at GooglePlus. [<https://plus.google.com/107268876853681007877>]. The name of Goodman’s various social media properties is “Crowdsource The Truth” (“CSTT”). Goodman claims that CSTT is the “original open source independent news agency”. According to Goodman, “Crowdsource the Truth is an independent news organization dedicated to truth in media and integrity in government. Our process is driven by a unique, open source fact checking ‘truth engine’ that has been described as a combination of investigative journalism, social media and reality television.”

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

12. As of May 7, 2018, 65,800 people subscribed to Goodman's YouTube channels, 4,606 people followed Goodman on Facebook, and Goodman had over 23,200 followers on Twitter. Goodman republishes all his YouTube videos to his Twitter followers, Facebook friends and Patreon subscribers.

13. Goodman uses his YouTube videos to advertise the business of CSTT and for purposes of trade. As is demonstrated by the *Fyreside Chat* video about Manny,⁵ Goodman solicits donations, advertises products and derives revenue from the videos uploaded to his YouTube Channel, to his Facebook, to his Twitter account, to Patreon.com, and to other social media properties controlled by Goodman, including www.truthleaks.org. In the "About" section of his YouTube channel, Goodman solicits financial support for his social media publications via "Public Bitcoin Payment Address" [<https://blockchain.info/address/14y2bEJ484DTbQwthX51VWpcRtk9Q7kmQQ>], "ETH payment address" [<https://twitter.com/csthetruth/status/939905920699691009>], "Public Litecoin Payment Address" [*id.*], "Public Monero Payment Address" [43wUVqtP6gZAUow6DKgQxzCCcKtRpjinV4fKvGmLCpLC6wst4KkYudsN9T3PosWjz3b5ADQU2RWAHSMrzyLJdpg6V2AVb4], and through a PayPal account.

⁵ Beneath the YouTube video, Goodman inserted the following words:

<p>Are shady political operatives attempting to control what some people think about Crowdsourcethe Truth?</p> <p>Become a sponsor of Crowdsourcethe Truth and support the effort</p> <p>http://paypal.me/crowdsourcethetruth</p> <p>https://www.patreon.com/crowdsourcethe...</p> <p>Public Bitcoin Payment Address 14y2bEJ484DTbQwthX51VWpcRtk9Q7kmQQ</p> <p>Public Monero Payment Address 43wUVqtP6gZAUow6DKgQxzCCcKtRpjinV4fKvGmLCpLC6wst4KkYudsN9T3PosWjz3b5ADQU2RWAHSMrzyLJdpg6V2AVb4</p>
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05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

[<https://www.paypal.me/crowdsourcethetruth>]. Goodman also encourages people to email him “for a private Bitcoin sponsorship link”. Goodman advertises merchandise, including coffee mugs and men’s and women’s t-shirts, for sale in his “on-line store”. https://www.redbubble.com/people/csthetruth/shop?utm_medium=email&utm_source=mkgem&utm_campaign=&asc=u].

14. Goodman profits from his defamation and tortious conduct. The traffic to Goodman’s YouTube channel and his Twitter, Patreon and GooglePlus accounts, including visits by sponsors, patrons and other viewers from Arizona, produces substantial recurring revenue for Goodman. Goodman’s social media accounts are active. Goodman’s videos and tweets target subscribers, patrons and viewers located in Arizona.

III. JURISDICTION AND VENUE

15. The Superior Court for the County of Maricopa has subject matter jurisdiction over this action.

16. The Court has personal jurisdiction over Goodman. Goodman targeted an Arizona citizen and has engaged in a persistent and ongoing course of defamation and tortious conduct that injured Manny in Arizona. Goodman has minimum contacts with Virginia such that the exercise of personal jurisdiction over him comports with traditional notions of fair play and substantial justice and is consistent with the Due Process Clause of the United States Constitution. Goodman’s videos and phone calls were (and are) purposefully directed at Arizona and were (and are) continuous and systematic. Manny’s claims directly arise from and relate to Goodman’s tortious conduct and publication of

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

false and defamatory statements in Arizona. *Calder v. Jones*, 465 U.S. 783 (1984); *Keeton v. Hustler Magazine, Inc.*, 465 U.S. 770 (1984).

17. Venue is proper in the Superior Court of Maricopa County because Goodman tortiously interfered with Manny's employment in Maricopa County; Goodman published and republished defamatory statements to persons who work and reside in Maricopa County; and Manny suffered harm in Maricopa County. A substantial part of the events giving rise to the claims stated in this action occurred in Maricopa County, Arizona.

IV. STATEMENT OF THE FACTS

18. In April 2017, Manny received a message from a person who identified themselves as the "Rabbit". Manny did not know the "Rabbit". The message included "Guccifer2.0" files and a request for information concerning any corruption and vote tampering evidence that might be on the files. The "Rabbit" was also looking for the password. Manny did not download the files because he did not have the space on his computer. However, he did look at the file tree and point out what files to look at for the information requested by the "Rabbit". Manny already had the password, so he sent it to the "Rabbit". Around the same time Manny received the message from the "Rabbit", a person identified as the "Fox" sent Manny a "NPGvan 7z" archive, stating that it was what Manny was looking for with regard to voter fraud.

19. Manny first heard of Goodman in or about June 2017. Manny was doing a radio show with Jimmy Church of Fade to Black Radio [<https://jimmychurchradio.com/>]. Some of Mr. Church's viewers asked Manny to help out Crowdsorce The Truth

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

("CSTT") with some files CSTT had received from the "Rabbit". Manny agreed to help CSTT.

20. On or about June 1, 2017, several people contacted Manny about a "NPGVan" file that CSTT had received. The file and its contents were referred to as the "Seth Rich Files". Manny was interested in the issues surrounding the murder of Democratic National Committee ("DNC") staffer, Seth Rich, so he started watching Goodman's YouTube channel. Manny received many requests to Skype with CSTT to help with the Seth Rich Files. Manny downloaded a copy of the Seth Rich Files he received from a CSTT community member and noticed that he already had a copy of the .zip file. Manny was very surprised. He thought to himself, "WTF is going on here? How the heck did CSTT get these files?"

21. Manny uploaded both the Seth Rich Files he received from CSTT and the "NPGVan 7z" files he had received from the "Fox". Manny told Goodman about both versions of the files and shared a mega link with both. The files were exactly the same, except one had been unpacked and repacked as a .zip, instead of a "7z" compressed file. Manny told Goodman the files were the same, and, in an effort to help, gave Goodman all his notes on the files. [See, e.g., <https://www.youtube.com/watch?v=0KJYxLWVtHw>; <https://www.youtube.com/watch?v=i0vIze2GWpA>].

22. On June 3, 2017, to Manny's total surprise, Goodman started talking about a difference in the files and started to paint Manny as a hacker who switched the files. [<https://www.youtube.com/watch?v=Tcne2VVHS14>].

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

23. Goodman then went on a rant and publicly accused Manny of “spoofing”⁶ the “Seth Rich Files”. [<https://www.youtube.com/watch?v=7mMoUgXCPBM;https://streamable.com/usm8y>].

24. Although Manny made a few videos explaining the situation and what had happened, Goodman decided to continue his defamatory rants about Manny. In video after video after June 3, 2017, Goodman constantly attacked Manny, falsely referring to Manny as “guccifer2.0”,⁷ falsely stating that Manny worked for “Crowdstrike”⁸ as a computer hacker, falsely stating that Manny is a “black hat” hacker, etc. [<https://streamable.com/lmluy>]. Goodman threatened Manny, calling him a “fucking asshole” and promised that Manny was “going down”. [<https://streamable.com/ib2rm>].

⁶ “Spoofing” means to deceive, hoax or trick someone. [<https://www.merriam-webster.com/dictionary/spoof>]. Spoofing, in general, is a fraudulent or malicious practice in which communication is sent from an unknown source disguised as a source known to the receiver. Therefore, in the information technology world, “spoofing” refers tricking or deceiving computer systems or other computer users. [<https://techterms.com/definition/spoofing>].

⁷ “Guccifer2.0” is a persona claiming to be the hacker(s) that hacked into the DNC computer network and then leaked its documents to the media, WikiLeaks, and a conference event. The “Guccifer2.0” persona went dark just before the U.S. Presidential election in November 2016. “Guccifer2.0” resurfaced on January 12, 2017, following the public release of a dossier by former MI6 agent Christopher Steele that asserted that Trump was linked to the Russian intelligence community. The “Guccifer2.0” persona made a blog post denying that he/they had any relation to the Russian government, and calling the technical evidence suggesting links to the Russian government “a crude fake.” In the blog post, “Guccifer2.0” indicated he/they had gained access to the DNC servers through a vulnerability in their “NGP VAN” software. NGP VAN, Inc. is a privately-owned voter database and web hosting service provider used by the Democrat Party, Democratic campaigns, and other non-profit organizations authorized by the Democrat Party. The platform or service is used by political and social campaigns for fundraising, campaign finance compliance, field organizing, and digital organizing. [See https://en.wikipedia.org/wiki/Guccifer_2.0]. **Manny is not Guccifer2.0.**

⁸ “CrowdStrike” is an American cybersecurity technology company based in Sunnyvale, California. [<https://www.crowdstrike.com/>]. **Manny has never worked for CrowdStrike.**

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

Goodman repeatedly called Manny a liar. [See, e.g., <https://streamable.com/hgrzl>]. Goodman's agents started calling Arizona and harassing Fyresite and Manny's family. Manny decided to just leave Goodman alone. After about a month of Goodman maliciously attacking Manny at any and every turn, Goodman realized that he had made a mistake about the Seth Rich Files. Goodman apologized to Manny and briefly left him alone. [See <https://www.youtube.com/watch?v=2jjofmoRfmc> (Video at 3:48 – “I do owe an official apology to Manuel Chavez.”)].

25. Prior to September 1, 2017, Manny interviewed Robert David Steele (“RDS”) several times and published the video interviews on his YouTube channel, “Defango”. See, e.g., <https://www.youtube.com/watch?v=NyzNrS77S9I> (“The Deep State is coming, the Deep State is coming! Interview with EX Cia Robert Steele #unrig”); https://www.youtube.com/watch?v=Xtz_S0tHlg (“Interview with Robert David Steele – Crowdalking, Crowdsourcing, and Talking about #UNRIG campaign”)].

26. On September 1, 2017, RDS filed suit against Goodman and others in the United States District Court for the Eastern District of Virginia.

27. On September 2, 2017, Manny published a video on YouTube, entitled “*Federal Lawsuit Filed Against Jason Goodman, Patricia Negron, and Queen Tut by Robert David Steele*”, in which Manny reviewed the complaint and expressed some thoughts about the suit. [<https://www.youtube.com/watch?v=hhXIWZKD22U>].

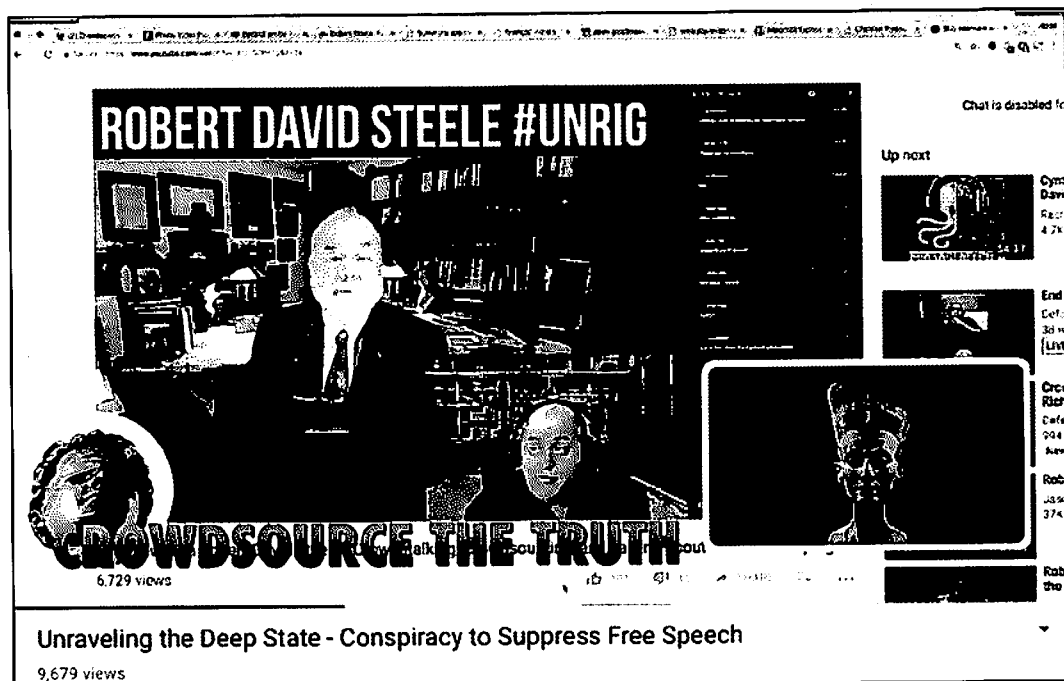
28. Goodman and his agents attacked Manny.

29. On September 23, 2017, Goodman and an anonymous confederate, identified as “Queen Tut”,⁹ produced and published a video on YouTube entitled,

⁹ “Queen Tut” is Susan Lutzke from Fort Collins, Colorado.

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

“Unraveling the Deep State – Conspiracy to Suppress Free Speech”. As of May 7, 2018, the video may be accessed by clicking the following link: <https://www.youtube.com/watch?v=Zep-7jk0BLA&feature=youtu.be>. Manny’s picture is shown numerous times in the video, e.g.:



In numerous places in the video, Goodman and Lutzke make false and defamatory statements about Manny, including false accusations that Manny was conspiring with RDS and others to restrict Goodman’s free speech and interfere with CSTT.

30. On September 27, 2017, Goodman published *Fyreside Chat*, ACTING IN CONCERT WITH yet another anonymous agent. The *Fyreside Chat* video has received over 7,700 views on Goodman’s YouTube channel alone. The video has also been republished by many others on the Internet. [See, e.g., <https://pastebin.com/H1pkcgLh>]. Goodman did not stop making false, defamatory, derogatory and disparaging comments about Manny.

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

31. On November 27, 2017, Goodman published a video on YouTube entitled, *"Deep State Dunces Attack George Webb and CSTT – Bitcoin Challenge Response"*. As of May 7, 2018, the video may be accessed by clicking the following hyperlink: <https://www.youtube.com/watch?v=GNxCk6nqFJg&feature=youtu.be>. The video opens with the following insulting picture and false words:¹⁰



In the video, Goodman makes many malicious, false, defamatory, derogatory and disparaging statements about Manny, including, calling him a “moron”, one of the “biggest idiots on the Internet”, a “deep state dummy” trying to “subvert the truth”, a “dope”, a “stupid loser”, stating that Manny had “stolen” Goodman’s text messages and was “stealing” Goodman’s information, that Manny had committed “criminal hacking”, that Manny is going to participate in an effort to take Goodman “down”, and that Manny

¹⁰ The other persons depicted in the picture are RDS (the horse) and a gentleman named Dave Acton (in the straight-jacket). Mr. Action is the brother of George Webb, a former associate of Goodman who has also been a-subject of Goodman’s scheme of defamation and intimidation.

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

seems to want to “help the criminals and the FBI” and the “criminals who want to sell Uranium One to the Russians and do all the other nefarious things that the Podestas and the Clintons have been up to.” At 14:20 of the video, Goodman reveals that “Red Bubble¹¹ is the website that all the Crowdsource The Truth merchandise is available on”. Goodman and CSTT are selling coffee mugs on Red Bubble with Manny’s picture on them:



Manny never consented to Goodman’s use of his picture for purpose of advertising and/or trade.

32. On December 17, 2017, Goodman published a video on YouTube entitled, “*Back at NYC HQ with an Update from the Mighty Quinn*”. As of May 7, 2018, the video may be accessed by clicking the following hyperlink: [https://www.youtube.com/watch?v=IAwVzy_9tu4]. The video features Goodman with

¹¹ “Red Bubble” is a website that advertises for sale products that are designed by “independent artists”. CSTT advertises and sells merchandise through Red Bubble. [https://www.redbubble.com/shop/crowdsourcing?ref=search_box].

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

a person he identifies as “Quinn Michaels”.¹² Goodman and “Quinn” appear in the video together, acting in concert:



In this video, Goodman makes a number of false and defamatory statements about Manny, including (at 28:14) the statement that “Manuel Chavez was lying from the very first moment that I met him on June 1st. He even says I one of his own videos that he had this file that Patricia Negron and George [Webb] Sweigert brought to me, and that he got it from the same person who gave it to Patricia Negron.” Goodman again falsely accuses Manny of working in “coordination” with others to set Goodman up “and now they are threatening you [Quinn Michaels].” Michaels and Goodman accuse Manny of being part of a “clandestine” group that is “corrupting the government” and causing problems

¹² “Quinn Michaels” is a person who often appears with Goodman. Michaels is a mentally disturbed person. Michaels believes that Manny stole “research” from him and other nonsense. On November 28, 2017, Manny published a video entitled, “A Letter to Quinn Michaels” [<https://www.youtube.com/watch?v=gtUdTOBIR24>], in an attempt to reason with Michaels. Goodman and Michaels retaliated against Manny by producing and publishing the *Mighty Quinn* video on December 17, 2017.

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

“inside the agencies”. Beginning at 33:42 of the video, Goodman states that Manny “has committed numerous civil torts and I believe criminal actions”. Michaels and Goodman then falsely suggest that the “FBI” is monitoring Manny and all his “associates”. Michaels and Goodman then stated that “you really have to be an idiot at this point not to think that guy’s up to something nefarious”. Goodman suggested that Manny knows “terrorists in Brooklyn”. Michaels states that he has “hard facts that he [Manny] was a web admin for the secret society ... this group of wierdos that I found ... very nefarious people”. Michaels and Goodman concluded by accusing Manny of engaging in “conspiracy and racketeering”.

33. Goodman’s repeated false and defamatory statements have caused Manny to suffer substantial harm, including loss and injury to his business, insult, pain, embarrassment, humiliation, and mental suffering, injury to reputation, and out-of-pocket loss.

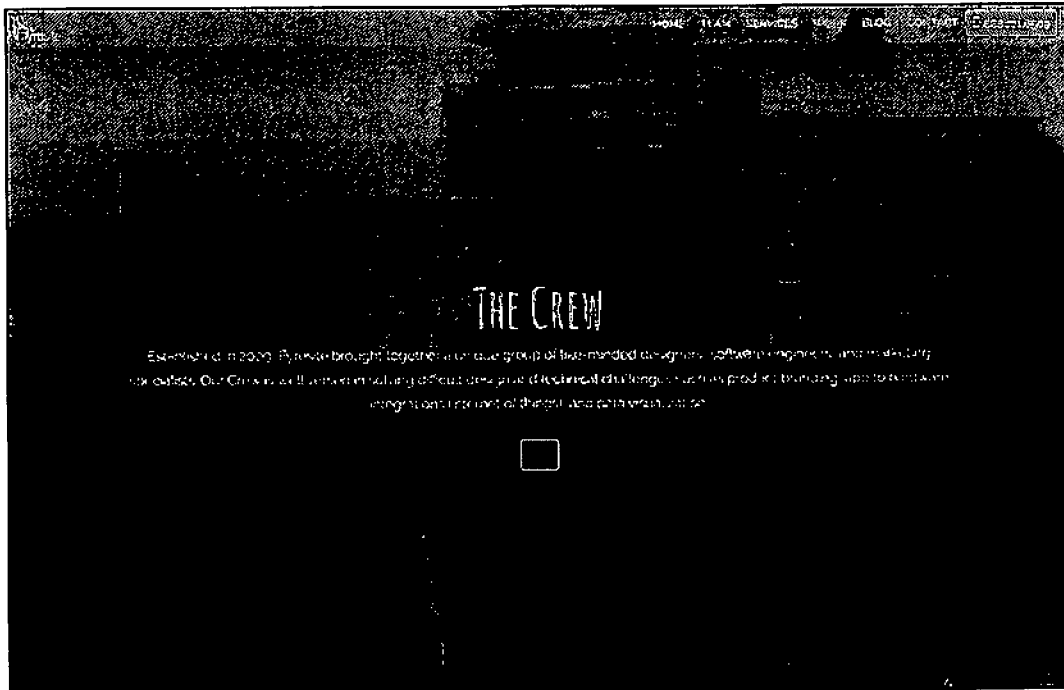
COUNT I – TORTIOUS INTERFERENCE

34. Manny restates paragraphs 1 through 33 of his Complaint and incorporates them herein by reference.

35. Manny had a valid contractual relationship and expectation of continued employment with Fyresite.

36. Goodman knew about Manny’s contract and business expectancy. Goodman conducted basic Internet research and, through this research, learned that Manny worked for Fyresite. <https://www.youtube.com/watch?v=Cy5ezPQotlE>. Goodman went on Fyresite’s website and learned that Manny was a part of the Fyresite “Team”:

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT



[<https://www.fyresite.com/author/manny/>]. Goodman obtained Fyresite's business telephone number from the website. Goodman visited the personal Facebook page of Jason Turnquist [<https://www.facebook.com/jason.turnquist>], and downloaded personal information about the Turnquists, including wedding photos, that Goodman then used to interfere with Manny's employment.

37. Goodman intentionally interfered with Manny's property rights, contract and business expectancies by, *inter alia*, devising, aiding, abetting and actively participating in the scheme to defame and injure Manny by repeatedly calling and harassing Fyresite and Jason Turnquist, by publicizing personal information and threatening to embroil Fyresite in controversy, by intentionally lying in YouTube videos and on Twitter, and by fabricating evidence and claims about Manny. Goodman's improper methods, actions and practices were, *inter alia*, defamatory, unethical, oppressive, over-reaching, fraudulent, hostile, and sharp. As evidenced by his direct

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

communications with Fyresite and his publication of the *Fyreside Chat* video, Goodman's motive was to get Manny fired.

38. Goodman's intentional and unlawful interference with Manny's contract of employment caused Fyresite to terminate Manny.

39. As a direct result of Goodman's tortious interference with Manny's contract and valid business expectations, Manny suffered damage and incurred loss, including, without limitation, loss of employment, injury to his property and business, financial loss, damage to reputation, attorney's fees, court costs, and other damages in an amount to be determined by the Jury, but not less than \$2,500,000.00.

COUNT II – DEFAMATION *PER SE*

40. Manny restates paragraphs 1 through 39 of his Complaint and incorporates them herein by reference.

41. Goodman published and republished to third-parties – including, without limitation, CSTT YouTube subscribers, Goodman's followers on Twitter (@csthetruth), CSTT's Facebook followers, patrons of CSTT on Patreon – numerous false factual statements, which are detailed verbatim above, of or concerning Manny.

42. By publishing YouTube videos, tweets, retweets and blogs on the Internet and by soliciting comments from third-parties, Goodman knew or should have known that his defamatory statements would be republished over and over by third-parties to Manny's detriment. Republication by both identified subscribers, users, patrons and anonymous persons on the Internet was the natural and probable consequence of Goodman's actions and was actually and/or presumptively authorized Goodman. In

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

addition to the original publications, Goodman is liable for the republication of the false and defamatory statements by third-parties.

43. Goodman's false statements constitute defamation *per se*. The statements accuse and impute to Manny the commission of numerous crimes involving moral turpitude and for which Manny may be punished and imprisoned in a state or federal institution. The statements impute to Manny an unfitness to perform the duties of an office or employment for profit, or the want of integrity in the discharge of the duties of such office or employment. Goodman's statements also prejudice Manny in his profession or trade.

44. Goodman's false statements caused Manny to suffer substantial harm and to incur significant loss.

45. Goodman acted with actual malice and reckless disregard for the truth for the following reasons:

a. Goodman, Negron and Lutzke intentionally set out to hurt Manny and to destroy his reputation with falsehoods. The YouTube videos, tweets, retweets and blogs were published in retaliation and reprisal.

b. Goodman's statements were knowingly false, with not a shred of supporting evidence.

c. Goodman chose to manufacture and publish false and scandalous statements and use unnecessarily strong and violent language, disproportionate to the occasion. Indeed, in multiple videos, including *Deep State Dunces*, Goodman expressed his clear and convincing feelings of ill-will and animus towards Manny.

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

d. Goodman did not act in good faith because, in the total absence of evidence, he could not have had an honest belief in the truth of their statements about Manny.

e. Goodman reiterated, repeated and continued to republish his false and defamatory statements, and enticed others to do so, out of a desire to hurt Manny and to permanently stigmatize and destroy Manny.

46. Goodman lacked reasonable grounds for any belief in the truth of his statements and acted negligently in failing to determine the true facts.

47. As a direct result of Goodman's defamation, Manny suffered substantial damage and loss, including, but not limited to, presumed damages and actual damages, loss or injury to business, pain and suffering, emotional distress and trauma, insult, anguish, stress and anxiety, public ridicule, humiliation, embarrassment, indignity, injury to reputation, prestige and standing, costs, expenses and out-of-pocket loss in an amount to be determined by the Jury, but not less than \$2,500,000.00.

COUNT III – FALSE LIGHT INVASION OF PRIVACY

48. Manny restates paragraphs 1 through 47 of his Complaint and incorporates them herein by reference.

49. By publishing the YouTube video and causing the republication of the videos by third-parties, Goodman generated substantial publicity about the false statements of or concerning Manny. Goodman placed Manny in a false light that would be highly offensive to any reasonable person.

50. Goodman had knowledge of or acted in reckless disregard as to the falsity of the publicized matter and the false light in which Manny would be placed by the false

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

statements. Goodman knew his statements and videos contained false information, innuendo, insinuations, or suggestions about Manny.

51. Goodman's actions constitute a false light invasion of Manny's privacy under the common law of Arizona.

52. As a direct and proximate result of Goodman's false light invasion of privacy, Manny suffered substantial damage and loss, including, but not limited to, pain and suffering, emotional distress and trauma, insult, anguish, stress and anxiety, public ridicule, humiliation, embarrassment, indignity, damage and injury to his reputation, attorney's fees, costs, and other out-of-pocket expenses in an amount to be determined by the Jury, but not less than \$2,500,000.00.

COUNT IV – CIVIL CONSPIRACY

53. Manny restates paragraphs 1 through 52 of his Complaint and incorporates them herein by reference.

54. Beginning in June 2017 and continuing through at least November 2017, Goodman combined, associated, agreed or acted in concert with Patricia Negrón ("Negrón"), a citizen of Massachusetts, Susan Lutzke, a citizen of Colorado, Michaels, a citizen of Oregon, and "What Big Eyes You Have", a citizen of Virginia, for the express purpose of injuring Manny's reputation and tortiously interfering with his business and employment through the publication and republication of false and defamatory statements and YouTube videos. In furtherance of the conspiracy and preconceived joint plan, Goodman and his confederates orchestrated a scheme the unlawful purpose of which was to defame Manny and destroy his reputation and business. Acting in concert, Goodman, Negrón and Lutzke utilized email, text messages, the Internet and various social media

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

properties, including YouTube, Twitter, Facebook, and Patreon, to publish, republish and spread the defamation and character assassination.

55. Goodman acted intentionally, purposefully, without lawful justification, and with the express knowledge that he and his cohorts were injuring Manny and interfering with his employment at Fyresite.

56. Goodman's actions constitute a conspiracy at common law.

57. As a direct result of Goodman's misconduct, Manny suffered damage and loss, including, but not limited to, loss of employment and injury to business, injury to reputation, attorney's fees, court costs, and other damages in an amount to be determined by the Jury, but not less than \$2,500,000.00.

COUNT V – MISAPPROPRIATION

58. Manny restates paragraphs 1 through 57 of his Complaint and incorporates them herein by reference.

59. Between June 2017 and November 2017, Goodman appropriated and used Manny's name, picture and likeness on multiple occasions without having first obtained Manny's written consent for purposes of trade or commerce.

60. Manny suffered damages resulting from Goodman's misappropriation of his name and picture, including, but not limited to, loss of business and property, the benefits Goodman and CSTT received by using his name and picture, attorney's fees, costs, expenses, and out-of-pocket loss in an amount to be determined by the Jury, but not less than \$2,500,000.00.

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

COUNT VI – PERMANENT INJUNCTION

61. Manny restates paragraphs 1 through 60 of his Complaint and incorporates them herein by reference.

62. Goodman unlawfully used Manny's name and picture, and he refuses to stop.

63. Manny requests the Court to permanently enjoin and order Goodman to cease and desist from any further use of Manny's name and/or picture. Manny further requests that Goodman be enjoined to remove or cause to be removed from the Internet and social media, including YouTube, Twitter, Patreon and GooglePlus, all videos, tweets, retweets, blogs and posts that contain Manny's name and picture, and to delete any and all other accounts that likewise contain Manny's name or picture.

64. Without Court intervention and an injunction, Manny will suffer actual and irreparable injury to his property interests, name and reputation.

65. There is a substantial likelihood that Manny will succeed on the merits of his claim that Goodman unlawfully used his name and picture, as Goodman has no right to use or to publish Manny's name and/or picture for advertising purposes or for purposes of trade. Manny does not have an adequate remedy at law.

Manny alleges the foregoing based upon personal knowledge, public statements of others, and records in his possession. Manny believes that substantial additional evidentiary support, which is in the exclusive possession of Goodman and his agents and other third-parties, will exist for the allegations and claims set forth above after a reasonable opportunity for discovery.

Manny reserves the right to amend this Complaint upon discovery of additional instances of Goodman's defamation and wrongdoing.

CONCLUSION AND REQUEST FOR RELIEF

WHEREFORE, Manny Chavez respectfully request the Court to enter Judgment against defendant, Jason Goodman, as follows:

- A. Compensatory damages in an amount to be determined by the Jury, but not less than \$2,500,000.00;
- B. Punitive damages in the amount of \$1,000,000.00 or the maximum amount allowed by law;
- C. Prejudgment interest at the maximum rate allowed by law from;
- D. Postjudgment interest at the rate of six percent (6%) per annum until paid;
- F. Attorney's Fees and Costs;
- G. Such other relief as is just and proper.

TRIAL BY JURY IS DEMANDED

DATED: May 9, 2018

05/09/2018 DRAFT - CONFIDENTIAL ATTORNEY WORK-PRODUCT

MANNY CHAVEZ

By: _____

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